

# City of Seattle Privacy Statement

The City of Seattle collects personal information from the public in order to provide many important services, including but not limited to, community and critical infrastructure protection, 9-1-1 call response, waste management, permitting, electricity delivery and health and human services (collectively, the “Services”). *We work to find a fair balance between gathering information to provide these needed services and protecting the public’s privacy.* We believe this is not only the right way to conduct our business but is also a critical component in gaining and maintaining the public’s trust in our stewardship of personal information.

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# City of Seattle Privacy Statement

## Purpose

We understand the value of personal information and work to protect the personal information we collect from the public. We are committed to providing greater transparency into our data privacy practices. As part of our deeper commitment to good data practices and data stewardship, the City has created the City of Seattle Privacy Principles to serve as a guide for all City departments that collect and use personal information. Please note that the City will be updating and improving our privacy and security posture over the next several months and that it will take time to implement certain changes throughout the City system. We appreciate your patience while we enhance and unify our privacy practices. Please contact us at [Privacy@seattle.gov](mailto:Privacy@seattle.gov) if you have any questions, or if you believe you see or experience policies or practices that are not yet in line with the principles set forth in this document.

*More information about the Privacy Principles and our Privacy Initiative may be found [here](#).*

## Scope

This Privacy Statement applies to the collection, use, disclosure, sharing and retention of personal information we obtain from individuals interacting with City departments, whether in person, on a website (<http://www.seattle.gov/>), or by mail in the course of providing City services. Each City department will strive to abide by and use this Privacy Statement to direct the handling of personal information, though from time to time it may be necessary for a City department to develop a practice that differs from this Privacy Statement. When that happens, we will do our best to provide you with notice of the practice and to let you know about your choices.

## City of Seattle Employees

This Statement does not apply to personal information we obtain in our capacity as an employer. Employment information is covered under separate policies which may be found on our Human Resources website, [here](#).

## Collecting your information

The City collects different kinds of information from the public in order to conduct City operations and provide the public with important services. Some of this information you provide directly to us. Some of it we collect in the course of your interactions with various City departments. To learn more about what we collect and how it is collected, click on the links below:

### What information we collect

We collect information necessary for City departments to provide services to the public, protect the public's health and safety, and to improve the efficiency and effectiveness of our operations. Our goal is to collect only enough information as is reasonable to perform our Services and to let you know when providing personal information is optional. We also seek to aggregate or otherwise de-identify personal data, when possible, whenever it is not necessary to store or share personally identifiable data elements. The table below provides some examples of the information we collect:

DESCRIPTION	EXAMPLES
PERSONALLY IDENTIFIABLE INFORMATION	Name, address, age, birthdate, social security number, driver's license number

WEBSITE INFORMATION	Information passively gathered from visitors on our website and from mobile devices
FINANCIAL INFORMATION AND PAYMENT CARD INFORMATION	Bank account number, credit or debit card numbers, or other billing information, such as when you pay your utilities, pay taxes, or sign up program membership or classes
HEALTH RECORDS	Medical information collected during emergency response, vaccination records, health program participation
DIGITAL IMAGES	Facility security cameras, City sponsored event photos, traffic camera video
UTILITY USE	Consumption data about electricity, water and waste management services
PERMITTING INFORMATION	New construction, reconstruction and remodeling, land use, events, utilities
PUBLIC SAFETY	Violations, court records, emergency calls
TRAFFIC MOVEMENT	Traffic flows, event monitoring
DEMOGRAPHIC INFORMATION	Income bracket, gender, race or ethnicity, vocation

### How we collect information through our website

Click on the links below for details about information we collect when you use our websites.

#### *Providing personal information on our website.*

You may choose whether to provide personal information online. "Personal information" is information about a natural person that is readily identifiable to that specific individual. Personal information includes such things as an individual's name, address, and phone number.

We collect no personal information about you unless you voluntarily provide it to us by sending us e-mail, participating in a survey, completing an online form, or engaging in an online transaction. You may choose not to contact us by e-mail, participate in a survey, provide personal information using an online form, or engage in an electronic transaction. However, you may not be able to access certain user-specific features of the web site without providing personal information.

#### *Information collected from visitors to our website.*

If you do nothing during your visit to our web site but browse, read pages, or download information, we will automatically gather and store certain information about your visit through the use of cookies and other similar tracking technologies. This information does not identify you personally. The information we collect through these technologies can include:

- The Internet Protocol Address and domain name used to access our web site. The Internet Protocol address is a numerical identifier assigned either to your Internet service provider or directly to your computer. We use the Internet Protocol Address to direct Internet traffic to you. This address can be translated to determine the domain name of your service provider (e.g. xcompany.com or yourschool.edu). Generally, the City only determines visitor domain names if a security issue is suspected;
- The type of browser and operating system you used;
- The date and time you visited this site;
- The web pages or services you accessed at this site; and

- The web site you visited prior to coming to this web site.

We may use this data automatically collected through cookies and other technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content; (c) provide and monitor the effectiveness of our website; (d) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website and our Service; (e) diagnose or fix technology problems; f) enhance network security; and (g) otherwise to plan for and enhance our Service or website. For example, the City's web site uses software programs to create summary statistics, which are used for such purposes as assessing what information is of most and least interest, determining technical design specifications, and identifying system performance or problem areas.

We may also use analytic and security tools hosted by third parties or managed within the City as part of maintaining our web presence. These tools help us measure traffic and usage trends for our web site and help ensure that this service remains available to all users. These tools can also be used to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. Except for authorized law enforcement investigations and the security purposes mentioned elsewhere in this notice, no other attempts are made to identify individual users or their usage habits. Raw data logs are used for no other purposes and are scheduled for regular destruction in accordance with public records retention schedules.

The City does not generally use cookies or other tracking technology to track its users across websites or over time, nor does it currently permit third party ad networks or other companies to track users on our web site. Because we do not track users over time and across websites, your use of the Do Not Track feature on your browser will have no effect on this web site.

*Information collected from website visitors who chose to provide personal information online.*

If during your visit to our web site you participate in a survey, send an e-mail, participate in a City hosted mailing list or web-based discussion, register an account, participate in online commerce, or perform some other transaction online, we may collect personal information from you, including:

- The e-mail address, and contents of the e-mail, for those who communicate with us via e-mail or who participate in a City hosted mailing list or web-based discussion.
- Information volunteered in response to a survey.
- Information provided through an online form for any other purpose.
- Information submitted when participating in an online transaction with the City.
- Information provided when you register an account.

The information collected is not limited to text characters and may include audio, video, and graphic information formats you send us.

We use your e-mail address to respond to you. We do not send you unsolicited e-mail unless you specifically elect to receive it or unless it is part of a transactional communication that is part of receiving a City service. Online discussion lists or "threads" are maintained and controlled in accordance with the [City's Electronic Conferencing and List Services Policy](#). Survey information is used for the purpose identified by the survey. Information from other online forms is used only for conducting City business related to the online form.

#### *Information collected from your mobile device*

If you access our website and online services or use an application on a mobile device, we may collect certain information about that device. Messages sent from certain mobile devices contain unique identifiers about the physical location of such devices. Mobile devices also typically transmit caller ID data when used to transmit a telephone call or text message. Depending on the device and its settings, this information includes but is not limited to geolocation data, unique device identifiers and other information about your type of device, wireless provider, date and time of transaction, browser type, browser language and other transactional information.

We may use this information to contact you and to respond to requests. We will not to use your phone number to initiate a call or SMS text message to you without your express prior consent. Your wireless carrier and other service providers also collect data about your SMS Service usage, and their practices are governed by their own privacy policies.

*Additional Resources:* To find out more about the information that your mobile device collects and transmits, and the options available to you to change factory defaults that may affect those transmissions, please consult with your wireless or mobile device provider. For general information about wireless industry laws and regulations, please go to the Cellular Telecommunications and Internet Association website at [http://ctia.org/consumer\\_info/service/](http://ctia.org/consumer_info/service/).

#### *Avoiding Internet Fraud*

Fraudulent scams called "phishing" have been increasing in frequency. "Phishing" involves a victim receiving an e-mail appearing to be from a legitimate business. The "from" line is often forged and the e-mail usually contains authentic looking graphics making it appear to be legitimate. The e-mail may also contain what appears to be a legitimate link to that organization, e.g., <http://www.seattle.gov/>. When the victim clicks on this link, they are then taken to what appears to be a legitimate looking website. Criminals can even make your browser's address bar contain the address of the legitimate organization despite the fact that the website is a forgery. Victims are then encouraged to enter personal information including credit card numbers and expiration dates.

We will not request confidential personal or financial information from our customers via an unsolicited e-mail. The City will also never send you an unsolicited e-mail containing a link to a City website where confidential personal or financial information is requested. If you receive such an e-mail, purportedly from the City, you are encouraged to immediately contact the City's Citizen Service Bureau at: (206) 684-CITY.

For more general information about "phishing" [visit the Federal Trade Commission web site](#). For specific information about a suspected phishing attempt, you may have received contact the organization represented in the suspect e-mail.

#### *How we collect information through other means*

Click on the links below for details about others ways we collect personal information.

#### *Paper forms*

City departments may collect information on paper forms as part of providing a government service or community engagement. These forms may request personal information, such as name, birthdate, address, telephone number, and email address. Forms may also request additional information necessary to determine

eligibility for a service, such as income. When possible, forms will note what information is required to obtain a government service or participate in a government function and what information is optional. In addition, the form will note if there are any options for “opting out” of certain data uses, such as follow-up communications not directly related to the service being requested. Please note that we will be updating our forms over time to contain these disclosures.

#### *Telephone calls*

Individuals may contact the City via phone such as when calling our Customer Service Bureau (CSB), Seattle City Light/Seattle Public Utilities Call Center, or when calling a City department or staff member directly. Our phone system automatically logs the phone number and other characteristics of calls to and from City numbers, such as call duration and the extension in the City that received or made a call. It is not possible to opt-out of this collection. During the course of your call to a call center, we may ask for additional information. This information will be used to help provide the requested service. The call taker will inform you about what information may be optionally provided. We will also provide notice if and when a call center records calls for training purposes or to improve the services.

We may also collect personal information when we call you or notify you of an event via phone or text message, including by creating a record of when a call was made and whether it was received by a live person.

#### *Email communication*

When sending an email to a City email address, such as [user@seattle.gov](mailto:user@seattle.gov), or [user@startupseattle.com](mailto:user@startupseattle.com), we collect personal information that may be contained in the email message and automatically log certain information about message, including the sender information, the IP address, routing information, and email address. It is not possible to opt-out of this collection.

In some cases, when the City sends an email to a user, it may contain beacons, which help the City track which emails have been opened and which links are clicked by our recipients.

#### *Video cameras*

Some City-owned facilities use video cameras to monitor activity and protect those working in or visiting the facility, or to protect the public. These include the following:

##### *Image recording*

Some City facilities use video cameras to monitor activity in common areas to protect the health and safety of those working in or visiting the facility. Notices will be posted in the area where these video cameras are in use. Depending on public policy, the needs of the facility, and applicable laws and regulations, these recordings may record video, audio, or both.

##### *Traffic cameras*

Main arterials and other roads, sidewalks and waterways have cameras posted to monitor traffic flow and major traffic events. The City also deploys red light cameras at some intersections to enforce the traffic laws.

##### *Public Safety*

There are a variety of video and audio capture technologies used for public safety purposes. For example, please see the following for more details governing some image recording technologies:

TECHNOLOGY	GOVERNANCE
IN CAR VIDEO SYSTEM	Seattle Police Department (SPD) Manual Chapter 16.090
BODY-WORN VIDEO PILOT PROGRAM	SPD Manual Chapter 16.091
AUTOMATIC LICENSE PLATE READERS	SPD Manual Chapter 16.170
COLLECTION OF INFORMATION FOR LAW ENFORCEMENT PURPOSES	Seattle Municipal Code (SMC) Chapter 14.12
HOLDING CELL CAMERA SYSTEM	SPD Manual Chapter 10.060
ACQUISITION AND USE OF SURVEILLANCE EQUIPMENT	SMC Chapter 14.18
AUTOMATED TRAFFIC SAFETY CAMERAS	SMC 11.50.570

### *Emergency response*

In certain public safety and emergency response situations, we collect biometric data, including fingerprints and health related measurements such as heart rate or blood pressure. In some cases, we also employ facial recognition technology to assist in public safety response. Due to the individualized and serious nature of emergency response efforts, a variety of personal information may be collected by first responders and other personnel, as needed, and such data collection, use and disclosure practices may fall outside of the scope of this Privacy Statement. Emergency call centers may also follow different protocols in the course of responding to emergency calls. Whenever possible, our emergency responders will attempt to honor the Privacy Principles and this Privacy Statement when collecting, using, storing or sharing personal information.

### Opting out

While it may limit the services we are able to provide, where it is possible we will present information about what we are collecting and provide an opportunity to accept or decline to provide it to us, such as follow-up communications not directly related to the service being requested. Please understand that in some circumstances, we may not be able to provide the desired services if you decline to provide necessary information.

### Using your information

We recognize that the public expects government both to protect individual privacy and to operate effectively. Toward that end, the City of Seattle uses personal information in the course of providing services, protecting the public's safety, meeting our mission obligations, and determining the best use of our resources. We endeavor to collect only as much information as is necessary to perform these functions and to limit information use to the purpose stated at the time of collection and to protect and improve our services. To learn more about how we use information to improve services, click on the links below:

### Research and Audit

We may use information we collect to help the City better understand community needs and improve the efficiency, effectiveness, and equity of our service delivery. When performing research, attempts will be made to de-identify data, either performing analysis at an aggregate level or removing data elements containing personal information that are not necessary for analysis.

## Systems Security

We may collect or use collected information for systems security purposes, and to ensure that our online website services remain available to all users. The City's online services may use software or services to detect fraudulent transactions, identify unauthorized attempts to upload or change information, or otherwise interference with service delivery.

## Sharing your information

We share information to coordinate delivery of services to the public, improve customer service, maintain data consistency, assess program performance, identify opportunities to improve our operations and because we are required to by law. We may also share information that has been aggregated or de-identified. To learn about how we share personally identifiable information, please click on the links below:

### Third-parties

We also share information with third parties who provide services on behalf of the City. For example, the City contracts with third parties to process financial transactions, technology companies that provide cloud and managed services, and analytics companies that measure traffic visiting the City's websites. In doing so we comply with state and federal laws and follow information security practices to protect both physically and electronically stored and transmitted data. We do not sell personal information to third parties for marketing purposes or for their own commercial use.

### Government Agencies

We may share information with other government agencies, external service providers, researchers, contracted vendors, and others to perform city functions and comply with applicable laws. We ask third parties to abide by our privacy principles when handling data provided by the City. In many cases, we require compliance through contractual obligations that include:

- Providing notice when information is collected and used on our behalf by contracted third parties.
- Directing that contracted third parties agree to and follow our contractual privacy requirements.

### Public Records Act

In the State Of Washington, Public Disclosure laws exist to ensure that government is open and that the public has a right to access records and information possessed by City government, as appropriate (The Public Records Act or "PRA" [RCW 42.56](#)).

The PRA requires the disclosure of public records unless a particular record (or particular information contained in a record) is specifically exempt from public access under the PRA or other applicable law. For example, there is no categorical exemption for residential telephone numbers, residential addresses, or personal e-mail addresses and therefore these data elements may be made public under the PRA. However, the PRA does not require the disclosure of "credit card numbers, debit card numbers, electronic check numbers, card expiration dates, or bank or other financial account numbers supplied to [the City] for the purpose of electronic transfer of funds, except when disclosure is expressly required by law."

In the event of a conflict between this Privacy Statement and the Public Records Act or other law governing the disclosure of records, the Public Records Act or other applicable law will determine our obligation. This means the City may be required to disclose your information in the event of a Public Disclosure Request; however, we will consider what information may be exempted before responding to a request.



## Open Data Program

For the purpose of government transparency, and consistent with the intent of the Public Records Act, the City posts some data sets to our Open Data portal, [data.seattle.gov](http://data.seattle.gov). This allows the public to view, access and use information gathered by the City for a variety of purposes, from research to technology innovation.

## Links to Third Party Websites

The City's web site has many links to other websites. These include links to web sites operated by other government agencies, nonprofit organizations and private businesses. When you link to another site, you are no longer on the City's website and this Privacy Statement will not apply. When you link to another website, you are subject to the privacy policy of that new site. Visitors linking to another site are encouraged to examine the privacy policy of that site.

Neither the City, or any department, officer, or employee of the City warrants the accuracy, reliability or timeliness of any information published by this system, nor endorses any content, viewpoints, products, or services linked from this system, and shall not be held liable for any losses caused by reliance on the accuracy, reliability or timeliness of such information. Portions of such information may be incorrect or not current. Any person or entity that relies on any information obtained from this system does so at his or her own risk.

## Retention

Public records created or received by the City must be retained for legal or operational purposes according to applicable laws. As a government entity, much of the information that the City collects is considered a public record regardless of format or where it is stored. More information about the Preservation and Destruction of Public Records may be found here [LINK to RCW 40.14]. When possible, the City may provide the right for an individual to request that information collected from the individual be deleted, unless the City is required to retain such information.

## Accuracy

We take reasonable steps to ensure that personal information we have is up-to-date. Where possible, we implement processes for updating inaccurate information that is used in the course of doing business. If you believe that your personal information needs to be updated, please complete the "[Request a City Service](#)" form and select the service type "Personal Information Change". We will take reasonable steps to verify your identity before granting access or making corrections.

## Accountability

We comply with laws, statutes and regulations that govern the information we collect. We also follow best practices and internal policies to reduce or eliminate the potential impact of new technologies and practices on the public's privacy. Should we become aware of programs or applications that are contrary to this privacy statement we will take steps to educate staff and remediate the issue. To learn more, click on the links below:

## Privacy Tools

To meet our departmental mission objectives and uphold our commitments to privacy, the City is implementing several new tools to help evaluate the effectiveness of our privacy protections. For example, the City is in the process of developing a Privacy Toolkit to assist City employees evaluate a new program or initiative, or when planning to purchase or develop a new technology. Staff consider the privacy implications of the new service or

technology by applying our “Privacy Principles.” The City is also creating procedures to require employees to conduct a Privacy Impact Assessment (PIA) before new technologies are employed to identify privacy risk and implement appropriate measures to reduce the risk of violating personal privacy. The PIA process is overseen by the City’s Privacy Program Manager. For information about that process, please see the Privacy Program webpage, [here](#). We will update this section as these tools are put in place across the City organization.

## Security

The City has taken steps to safeguard the integrity of its data and to prevent unauthorized access to information it maintains. Depending on the type of information, we may use physical, administrative and technological techniques to protect data including but not limited to access control, monitoring, auditing, and encryption to secure data. Security measures have been integrated into the design, implementation and day-to-day practices of the entire operating environment as part of the City’s continuing commitment to protecting our environment. Details about City security may be found on our Information Security webpage, [here](#).

This information should not be construed in any way as giving business, legal, or other advice, or warranting as fail proof, the security of information provided via the City's web site. Please remember that no security system is impenetrable and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, the City will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

## Equity

We are mindful of the populations we serve and how data about members of the public, including vulnerable populations, can and should be used. Our Privacy Principles are consistent with our Race and Social Justice Initiative. Details about RSJI may be found, [here](#).

## Learn more about Privacy

- [Washington State Public Records Act](#)

City of Seattle Resources:

- [Information Systems Security Policy](#)
- [Privacy Program](#)
- [Privacy Principles](#)
- [Public Records Request](#)
- [Surveillance Ordinance](#)
- [Declaration of Privacy as Human Right](#)

## How to Contact Us

If you have a general privacy question please contact our Privacy Program Manager:

- By email at [privacy@seattle.gov](mailto:privacy@seattle.gov).
- By Phone: 206-684-2489 (CITY)

## Document Control

This document will be reviewed annually and updated as necessary by the Privacy Program Manager, and reviewed and approved by the Chief Technology Officer.

Version	Changes	Approval	Date
1.0 Original	N/A	Michael Mattmiller	9/30/2015